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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

EPIC GAMES, INC.

Plaintiff, Counter-defendant
v.

APPLE INC.,

Defendant, Counterclaimant

Case No. 4:20-cv-05640-YGR-TSH

**EXHIBIT A (REDACTED) TO
DECLARATION OF MARK A. PERRY IN
SUPPORT OF APPLE INC.'S STATEMENT
IN SUPPORT OF ADMINISTRATIVE
MOTION TO SEAL**

The Honorable Thomas S. Hixson

EXHIBIT A

(Redacted)

Bates Number of Parent Document (Folder Title)	Number	Production Beginning Bates	Production End Bates	Custodians	DocDate	DocTime	From	To	Cc	Bcc	Subject	OriginalName	Redact or Withhold	PrivilegeType	Privilege Description	Additional Privilege Context	Attorneys, Legal Staff, and Employees acting at the direction of counsel	Special Master Determinations (Priv - Yes; Priv - No)	Optional Special Master Notes
PRIV-APL-EG_00251370	10511	PRIV-APL-EG_00251372	PRIV-APL-EG_00251385	Tam, Mike								Alternative EU Terms Addendum_LYL 173_20240502.pdf	Withhold	AttorneyClient; WorkProduct	Document providing legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA, prepared in anticipation or furtherance of litigation	The withheld document is a draft Alternative Terms Addendum prepared by counsel containing counsel's revisions to ensure compliance with EU regulations.	No attorneys listed on Document but this is a draft Alternative Terms Addendum prepared by counsel containing counsel's revisions to ensure compliance with EU regulations.	no	predominantly business
PRIV-APL-EG_00251370	10512	PRIV-APL-EG_00251388	PRIV-APL-EG_00251399	Tam, Mike	2024-05-01	22:52:00						Alternative EU Terms Addendum_LYL 173_20240502.docx	Withhold	AttorneyClient; WorkProduct	Document providing legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA, prepared in anticipation or furtherance of litigation	The withheld document is a draft Alternative Terms Addendum prepared by counsel containing counsel's revisions to ensure compliance with EU regulations.	No attorneys listed on Document but this is a draft Alternative Terms Addendum prepared by counsel containing counsel's revisions to ensure compliance with EU regulations.	no	predominantly business
PRIV-APL-EG_00250683	10444	PRIV-APL-EG_00250684	PRIV-APL-EG_00250689	Kosmynka, Trystan; Elman, Josh; Tam, Mike	2023-02-07	17:02:00						External Link Account Entitlement Addendum - 2.7.2023.docx	withhold	workProduct	Document reflecting work product from counsel regarding foreign compliance and U.S. Link Entitlement program eligibility, prepared in anticipation or furtherance of litigation	lawyer sending around reader app addendum that adds tvOS	Document indicates that Apple legal weighed in on this issue	no	
PRIV-APL-EG_00154061	561	PRIV-APL-EG_00154081	PRIV-APL-EG_00154063	Ajemian, Peter; Goldberg, Marni	2024-01-14	17:48:40	Ling Lew	Mami Goldberg	Fred Sainz; [REDACTED]; Peter Ajemian		Re: Updated Wisconsin materials	20240114-0948 Re: Updated Wisconsin materials.eml	Redact	AttorneyClient	Email chain with redacted text providing legal advice from counsel regarding injunction compliance requirements for user design and interface		Adil Karrar (Apple in-house counsel); Brendan McNamara (Apple in-house counsel); Gail Elman (Apple in-house counsel); Jennifer Brown (Apple in-house counsel); Ling Lew (Apple in-house counsel); Nina Haefele (Apple in-house counsel); Sean Cameron (Apple in-house counsel); Lacey Elmore (Apple in-house counsel)	No	
PRIV-APL-EG_00155669	753	PRIV-APL-EG_00155669	PRIV-APL-EG_00155675	Ajemian, Peter	2023-10-31	06:55:01	Eric Albert	Scott Radcliffe	Gary Davis; [REDACTED]; Brendan McNamara; [REDACTED]; Matt Browne; [REDACTED]; Philip Eder Levacher; [REDACTED]; Fred Sainz; [REDACTED]; David (Security) Thompson; [REDACTED]; Julien Trosdorf; [REDACTED]; Peter Ajemian; [REDACTED]; Isaac Rubin		Re: DRAFT: DMA Q&A for European Security Press Tour in Paris	20231030-2355 Re: DRAFT: DMA Q&A for European Security Press Tour in Paris.eml	Withhold	AttorneyClient	Email chain reflecting legal advice from counsel regarding foreign regulatory issues in the European Union, including DMA	Discussion of draft responses to DMA-related questions; email on p.2 indicates attorneys have been editing draft, and current draft is being sent to attorney for compliance review	Brendan McNamara (Apple in-house counsel); Gary Davis (Apple in-house counsel)	No	
PRIV-APL-EG_00155679	755	PRIV-APL-EG_00155679	PRIV-APL-EG_00155608	Ajemian, Peter	2022-11-30	19:22:48	Fred Sainz	Adam Dema	Peter Ajemian; [REDACTED]		Re: Pricing capabilities announcement planning	20221130-1122 Re: Pricing capabilities announcement planning.eml	Redact	AttorneyClient	Email chain with redacted text reflecting legal advice from counsel regarding foreign regulatory issues in Korea	foreign regulatory issues in Korea.	Sean Cameron (Apple in-house counsel)	No	
PRIV-APL-EG_00085160	1540	PRIV-APL-EG_00085160	PRIV-APL-EG_00085196	Hawthorne, Amy	2020-03-17	17:01:19						ABC_Customer Management and Consumption APIs (aka [REDACTED] 2.0) - BRD.pdf	Redact	AttorneyClient	Document with redacted text reflecting legal advice from counsel regarding customer management.	Counsel's legal advice redacted.	Lew Ling (Apple in-house counsel)	NO	PREDOMINANT PURPOSE IS BUSINESS OR TECHNICAL; NOT LEGAL ADVICE.